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Attorney for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE DUCTILE IRON PIPE FITTINGS ("DIPF") INDIRECT **PURCHASER ANTITRUST** LITIGATION

Civ. No. 12-169 (AET)(LHG)

NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENTS, CERTIFYING THE SETTLEMENT CLASSES AND ALLOWING FOR CREATION OF ESCROW FUND FOR LITIGATION EXPENSES

PLEASE TAKE NOTICE that on June 6, 2016, or as soon thereafter as counsel may be heard, Settlement Class Counsel move before the Honorable Anne E. Thompson, United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting final approval to settlements between Indirect Purchaser Plaintiffs and Defendants SIGMA and Star, finally certifying the Settlement

Classes, and allowing for the creation of an escrow fund, in the amount of \$459,250, to be used solely for litigation expenses already incurred and to be incurred in the prosecution of this action against Defendant McWane.

In support of their motion, the movant will rely upon the accompanying Memorandum of Law, Declaration and Exhibits. A proposed Order is filed herewith.

Dated: May 12, 2016

s/Lisa J. Rodriguez

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